

1 **O'CONNOR BERMAN DOTTS & BANES**
2 **Second Floor, Nauru Building**
3 **1 Nauru Loop**
4 **Susupe, Saipan, CNMI**
5 **Mail: PO Box 50-1969 Saipan MP 96950**
6 **Phone: 234-5684**
7 **Fax: 234-5683**

8 **Attorneys for Plaintiff**

9 **IN THE DISTRICT COURT**
10 **FOR THE NORTHERN MARIANA ISLANDS**

11 **QIAN XIAOLI,**

12 **Plaintiff,**

13 **vs.**

14 **GRACE INTERNATIONAL, INC.,**

15 **Defendant.**

16 **Civ. No. 07-0017**

17 **DECLARATION OF**
18 **JOSEPH E. HOREY**

19 I, Joseph E. Horey, declare as follows:

20
21 1. I am an attorney licensed to practice in the Commonwealth of the Northern Mariana
22 Islands. I am a member of the law firm of O'Connor Berman Dotts & Banes. I am counsel of record
23 for Qian Xiaoli, Plaintiff and prevailing party in the above captioned matter. I make this declaration
24 based upon personal knowledge and a review of firm records and files.

25 2. Attached hereto as Exhibit A is a true and accurate itemized and chronological statement
26 of the services rendered and hours worked by myself and others in the firm in connection with our
27 representation of Plaintiff in the above captioned matter. All of this work was necessary and
28 appropriate to an effective representation of Plaintiff in this matter, and the fees are within the
reasonable range of fees charged for such work within the CNMI legal community. The hourly rates
are the rates customarily charged by the firm to its clients in 2005 when this case first commenced,
as shown on the schedule of fees attached hereto as Exhibit B.

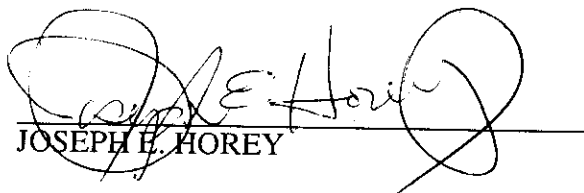
1 3. The person identified as "Islam" in the billing records is Md. Serajul Islam, Plaintiff's
2 friend, who served as my customary point of contact with Plaintiff.

3
4 4. Copying costs are based upon logs maintained by firm office staff indicating the number
5 of copies made and the cases for which they were made. Copies are billed herein at the rate of 10
6 cents per page.

7
8 5. Since Plaintiff speaks only very limited English, it was necessary to employ Chinese
9 interpreters when meeting with her at any length, when calling her on the phone in China, when she
10 testified at her deposition, and when she testified in court at the hearings on the preliminary
11 injunction and for final judgment. I first employed Qian Lieberman as interpreter until she relocated
12 out of the CNMI, and then employed Jean Shi. Each of them has submitted bills for their
13 interpretation work, which are attached hereto as Exhibits C and D.

14
15 I declare upon penalty of perjury under the laws of the Commonwealth of the Northern
16 Mariana Islands that the foregoing is true and accurate to the best of my knowledge and belief, and
17 that if called upon to testify I could and would testify competently and in accordance herewith.

18
19 Executed at Saipan, CNMI, this 21st day of December, 2007.

20
21
22 
23 JOSEPH E. HOREY
24
25
26
27
28

O'CONNOR BERMAN DOTTS & BANES

ATTORNEYS AT LAW

GUAM OFFICE
 Suite 503, Bank of Guam Bldg.
 111 Chalan Santo Papa
 Hagåtña, Guam 96910
 Telephone: (671) 477-2778
 Fax: (671) 477-4366
 E-mail: bermilaw@kuentos.guam.net

SAIPAN OFFICE
 Second Floor, Nauru Building
 P.O. Box 501969, Saipan, MP 96950-1969
 Telephone: (670) 234-5684/5
 Fax: (670) 234-5683
 E-mail: attorneys@saipan.com
 Website: www.pacific-lawyers.com

POHNPEI OFFICE
 Ocean View Plaza - East Wing
 P.O. Box 2069, Pohnpei
 Federated States of Micronesia, 96941
 Telephone: (691) 320-6450
 Fax: (691) 320-6451
 E-mail: msipos@mail.fm

Invoice # 43425

Professional services

		<u>Hours</u>
10/5/05	JEH Meeting with potential client re ADA case.	0.30
10/13/05	JEH Meeting with Mike Dotts re EEOC matter.	0.30
	JEH Phone conversation with EEOC Hawaii office.	0.20
	JEH Draft letter of representation to EEOC.	0.40
10/20/05	JEH Phone conversation with James Yao at EEOC Honolulu office re status and prospects for case.	0.20
10/27/05	JEH Conversation with Islam re progress of case.	0.20
11/21/05	GLH Meeting with Jed Horey re hearing.	0.50
11/21/05	GLH Meeting with clients.	0.40
11/23/05	JEH Phone conversation with Islam re EEOC phone conference.	0.20
11/28/05	JEH Review relevant documents preparatory to tomorrow's phone conference with EEOC.	1.00

Exhibit "A"

Qian, Xiao Li

Page 2

		Hours
11/29/05	JEH Meeting with client re EEOC matter.	0.30
	JEH Phone conversation with client re conversation with Yao.	0.20
	JEH Phone conference with James Yao.	0.40
11/30/05	JEH Phone conversation with James Yao of EEOC re teleconference--he needs to reschedule. Phone conference with Islam to advise re same.	0.40
12/8/05	JEH Phone conversation with James Yao of EEOC re setting up phone conference. Phone conversation with client re same.	0.40
12/9/05	JEH Phone conversation with James Yao re rescheduling call.	0.20
12/15/05	JEH Phone conversation with Islam re teleconference.	0.20
12/16/05	JEH Draft letter to James Yao at EEOC.	0.40
12/20/05	JEH Phone conversation with Islam re meeting.	0.20
	JEH Teleconference with James Yao of EEOC (with client).	2.50
	JEH Draft follow-up letter to Yao.	0.40
1/19/06	JEH Draft letter to James Yao at EEOC.	0.40
1/20/06	JEH Phone conversation with James Yao re status of case.	0.40
1/26/06	JEH Meeting with client re witnesses.	0.30

Qian, Xiao Li

Page 3

		<u>Hours</u>
1/26/06	JEH Draft letter to James Yao at EEOC re witnesses.	0.40
3/7/06	JEH Draft letter to James Yao at EEOC inquiring re status of case.	0.40
3/8/06	JEH Phone conversation with James Yao of EEOC re witnesses.	0.20
3/13/06	JEH Draft letter to client re Yao's response.	0.40
3/16/06	JEH Phone conversation with Islam re conversation with Yao.	0.20
3/22/06	JEH Draft letter to James Yao re witnesses.	0.40
4/4/06	JEH Review message from client re witness. Draft letter to James Yao (EEOC) re same.	0.40
4/13/06	JEH Phone conversation with Islam re progress of case.	0.20
	JEH Draft memo to James Yao at EEOC re progress of case.	0.30
4/14/06	JEH Prepare for discussion with EEOC.	0.30
4/19/06	JEH Phone conversation with James Yao re progress of case.	0.20
4/26/06	JEH Phone conversation with Islam re settlement proposal.	0.20
5/3/06	JEH Phone conversation with Islam re calculation of damages.	0.20
	JEH Research applicable law re settlement demand.	1.40
	JEH Meeting with Mike Dotts re settlement demand.	0.30
5/8/06	JEH Meeting with client re settlement demand in EEOC case.	0.40
	JEH Draft letter to James Yao at EEOC re settlement demand.	0.40
6/2/06	JEH Meeting with Islam re status of case.	0.20
	JEH Draft letter to James Yao.	0.20

Qian, Xiao Li

Page 4

		<u>Hours</u>
6/6/06	JEH Review memo from James Yao and forward same to client.	0.20
6/8/06	JEH Review letter from James Yao.	0.20
6/16/06	JEH Draft letter to client re Yao's questions.	0.40
7/5/06	JEH Draft letter to client.	0.40
7/10/06	JEH Meeting with MWD re case.	0.30
8/1/06	JEH Meeting with MWD re developments in EEOC matter.	0.20
	JEH Phone conversation with Islam re meeting.	0.20
8/2/06	JEH Meeting with client re Yao's questions.	0.50
8/3/06	JEH Meeting with MWD re EEOC issues.	0.30
	JEH Draft memo to client re EEOC issues.	0.30
8/4/06	JEH Review letter from client.	0.20
	JEH Meeting with client.	0.50
	JEH Teleconference with client and Yao of EEOC.	2.00
9/6/06	JEH Phone conversation with Islam re progress of case.	0.20
	JEH Draft letter to James Yao inquiring re status determination.	0.30
9/7/06	JEH Phone conversation with James Yao re progress of EEOC case.	0.20
9/22/06	JEH Review letter from client.	0.50
	Draft response to same.	
	JEH Phone conversation with Islam re meeting.	0.20
9/25/06	JEH Review letter from client.	0.20
9/28/06	JEH Meeting with client re available work, per inquiry of James Yao.	1.00
9/29/06	JEH Draft letter to James Yao of EEOC.	0.40
11/10/06	JEH Draft letter to James Yao of EEOC.	0.40

Qian, Xiao Li

Page 5

		<u>Hours</u>
11/17/06	JEH Review e-mail from James Yao at EEOC.	0.20
	JEH Phone conversation with Islam re meeting.	0.20
	JEH Meeting with client re Yao's questions.	0.30
	JEH Draft response to Yao.	0.30
12/6/06	JEH Draft letter to James Yao re Fishman report and send him copy of same.	0.40
12/13/06	JEH Phone conversation with James Yao re EEOC case.	0.20
12/19/06	JEH Meeting with MWD re whether to request EEOC right to sue letter.	0.40
12/23/06	JEH Draft letter to James Yao re mediation and file.	0.40
12/26/06	JEH Phone conversation with MWD re right to sue letter.	0.20
1/19/07	JEH Meeting with client re EEOC claim.	0.30
1/24/07	JEH Phone conversation with James Yao of EEOC re right to sue letter.	0.30
1/25/07	JEH Meeting with Islam re Yao's position on right to sue letter.	0.30
2/6/07	JEH Research re EEOC right to sue letter.	0.30
2/7/07	JEH Draft letter to James Yao requesting right to sue letter in EEOC matter.	0.40
	JEH Phone conversation with Tim Bellas of Garment Oversight Board re rumor of Grace closure.	0.20
2/12/07	JEH Review right to sue letter received from EEOC.	0.20
2/14/07	JEH Phone conversation with Islam re meeting.	0.20

Qian, Xiao Li

Page 6

		<u>Hours</u>
2/14/07	JEH Meeting with client re file request from EEOC.	0.20
2/28/07	JEH Fill out disclosure form. Draft letter to EEOC re same.	0.70
3/23/07	JEH Phone conversation with Islam re Grace closure.	0.20
4/3/07	JEH Meeting with MWD re impending closure of Grace.	0.40
	JEH Meeting with client re impending closure of Grace.	0.50
4/4/07	JEH Phone conversation with Labor counsel Dede Hill re Grace closure.	0.20
4/9/07	JEH Phone conversation with client re filing case.	0.20
4/10/07	JEH Phone conversation with Islam re Grace.	0.20
4/15/07	JEH Research and draft complaint for federal court action. Research re motion for preliminary injunction.	4.10
4/16/07	JEH Research re preliminary injunction. Draft motion for preliminary injunction and declaration in support of same. Revise draft complaint. Meeting with client re declaration.	3.00
	ABS Obtain annual report for Grace International. Prepare summons and filing package.	1.00
4/17/07	JEH Modify motion for preliminary injunction.	3.70
	ABS Prepare service process package. Call and see process server.	0.50
	JEH Phone conversation with Grace counsel, Matt Smith re pending action and motion.	0.30

Qian, Xiao Li

Page 7

		<u>Hours</u>
4/18/07	JEH Draft and research application for temporary restraining order.	1.00
	ABS Prepare exparte motion, certificate under 71h3b, and TRO. Prepare filing package. Call to District Court. Email and fax opposing counsel.	2.00
4/19/07	JEH Meeting with MWD to prepare for hearing on TRO.	0.40
	ABS E-filed proof of service (Pacer).	0.50
	JEH Research legal issues re injunctions.	0.60
4/20/07	JEH Meeting with MWD re motion hearing.	0.30
4/23/07	JEH Meeting with Islam re TRO.	0.20
	JEH Phone conversation with court re interpreters.	0.20
	JEH Phone conversations with two possible interpreters for TRO hearing.	0.30
4/24/07	JEH Research legal issues in case. Prepare for hearing on injunction. Meeting with client to prepare for hearing on injunction.	5.00
4/25/07	JEH Draft letter to Matt Smith re settlement proposal.	0.40
	JEH Brief meeting with MWD re settlement proposal.	0.20
	JEH Research re damages.	0.50
4/30/07	JEH Prepare for hearing on motion for preliminary injunction. Meeting with client re same.	0.60
	JEH Phone conversation with Matt Smith re continuance of hearing. Arrange timing of continued hearing. Review and sign stipulation.	0.60

Qian, Xiao Li

Page 8

		<u>Hours</u>
4/30/07	JEH Review case management order.	0.20
5/1/07	JEH Phone conversation with District Court for clarification of date for case management conference.	0.20
	ABS Phone call to DOL re payment to complainant.	0.25
	JEH Draft letter to Matt Smith re settlement.	0.40
5/2/07	JEH Go to District Court to sign original stipulation.	0.40
	ABS Phone call to Jojo, DOL re payments.	0.25
5/4/07	JEH Review brief filed by Grace in opposition to injunction.	0.40
	JEH Phone conversation with Matt Smith re possible settlement.	0.20
	JEH Phone conversation with Wilma at EEOC re file.	0.20
	JEH Draft letter to Wilma re possible settlement; send with check for file.	0.40
	JEH Meeting with MWD re implications of withholding tax on calculation of damages. Meeting with GJK re same.	0.30
	JEH Research withholdin tax issue.	0.30
	JEH Phone conversation with Islam re tax records.	0.20
	JEH ssues.	0.20
	JEH Phone conversation with Qian re hearing.	0.20
	JEH Research and draft premliminary disclosures.	0.60
	JEH Phone conversation with Matt Smith re disclosures and settlement.	0.20
5/7/07	JEH Prepare for preliminary injunction hearing. Court appearance for hearing. Argue motion and examine witness.	4.80

Qian, Xiao Li

Page 9

		<u>Hours</u>
5/7/07	JEH Phone conversation with Matt Smith re setting up scheduling conference.	0.20
5/8/07	JEH Phone conversation with Matt Smith re case management conference (twice).	0.30
5/9/07	JEH Phone conversation with Matt Smith re settlement conference (twice).	0.20
	JEH Phone conversation with interpreter Qian Lieberman re settlement conference.	0.20
	JEH Review e-mail correspondence.	0.10
5/10/07	JEH Phone conversation with client and interpreter re settlement offer.	0.20
5/11/07	JEH Prepare for settlement conference. Attend settlement conference. Meet with client re settlement offers. Negotiate with Grace, but they offer only \$4000. No settlement reached.	4.00
5/14/07	JEH Review documents received from EEOC.	0.30
5/17/07	JEH Review order granting injunction. Meeting with client to discuss same.	0.40
5/18/07	JEH Meeting with Andrew re monitoring Grace.	0.30
5/29/07	JEH Phone conversation with client re her pending departure for China.	0.20
6/7/07	JEH Phone conversation with Islam re client's departure for China (twice).	0.30
	JEH Draft letter certification letter for client.	0.40

Qian, Xiao Li

Page 10

		<u>Hours</u>
6/7/07	JEH Phone conversation with Tina at district court re letter confirming case.	0.20
	JEH Phone conversation with Immigration Director Mel Gray re re-entry letter.	0.20
6/8/07	JEH Meeting with client re her departure.	0.30
	JEH Phone conversation with Qian Lieberman re client's departure.	0.20
	JEH Draft letter to Matt Smith re deposition.	0.20
6/12/07	JEH Meeting with MWD re status conference.	0.30
	JEH Draft notice of deposition.	0.40
	JEH Phone conference with Matt Smith re deposition.	0.20
	JEH Phone conversation with Qian Lieberman re status conference.	0.20
	JEH Phone conversation with Islam re status conference.	0.20
	JEH Phone conversation with Qian Lieberman re deposition.	0.20
6/13/07	MWD Attend status conference.	1.00
7/2/07	JEH Phone conversation with Islam re translator.	0.20
7/3/07	JEH Phone conversation with Islam re meeting.	0.20
7/4/07	JEH Prepare for deposition. Meeting with client to prepare for deposition.	4.50
7/5/07	JEH Prepare for deposition. Conduct deposition of plaintiff to preserve testimony.	5.00
7/6/07	JEH Draft power of attorney for management of affairs following client's departure for China.	1.00

Qian, Xiao Li

Page 11

		<u>Hours</u>
7/6/07	JEH Continue and conclude deposition of Qian Xiaoli.	2.00
7/23/07	JEH Meeting with Islam re Qian's treatments in China.	0.30
7/27/07	JEH Draft interrogatories.	3.90
	JEH Draft letter to client.	0.40
	JEH Draft 30(b)(6) deposition notice for Grace.	1.00
7/30/07	JEH Phone conversation with Islam re contact information for client.	0.10
	JEH Phone conversation with translator Jean Shi re contacting client in China (twice).	0.30
	JEH Phone conversation with client in China re non-renewal notices.	0.50
	JEH Meeting with Islam re contacting client in China.	0.20
8/1/07	JEH Revise interrogatories and notice of deposition.	0.40
8/8/07	JEH Phone conversation with client re witness Chen Lina (twice).	0.30
8/13/07	JEH Phone conversation with Matt Smith re his withdrawal from representation of Grace.	0.20
	JEH Review Smith's motion to withdraw.	0.30
	JEH Discuss Smith's motion to withdraw with MWD.	0.40
8/14/07	JEH Phone conversation with Matt Smith re withdrawal and possibilities for settlement.	0.20
8/15/07	JEH Research and draft response to Matt Smith's motion to withdraw.	0.80
8/16/07	JEH Review District Court's order. Discuss with MWD.	0.40
8/17/07	JEH Phone conversation with Jean Shi re contacting client.	0.20

Qian, Xiao Li

Page 12

		<u>Hours</u>
8/20/07	JEH Meeting with Jean Shi. Phone conversation with client's father.	0.40
	JEH Phone conversation with Jean Shi re recent events in case.	0.20
	JEH Draft motion to amend order on status / settlement conference.	0.60
8/21/07	JEH Revise draft motion to modify order.	0.20
	ABS E-file motion to modify order. Prepare service package to Grace (mail).	0.50
8/22/07	ABS E-file and prepare proof of service.	0.50
9/3/07	JEH Phone conversation with Jean Shi re contacting client about order.	0.20
	JEH Prepare for 30(b)(6) deposition of Grace.	5.70
9/4/07	JEH Prepare for deposition of Grace. Grace fails to appear for deposition.	1.20
9/5/07	JEH Phone conversation with Jean Shi re contact with client.	0.20
9/10/07	JEH Research file in similar earlier matter re proceedings after defendant's abandonment of case.	0.80
9/11/07	JEH Phone conversation with Jean Shi re contacting client.	0.20
	JEH Prepare for status/settlement conference.	1.00
	JEH Meeting with Jean Shi re contacting client for status conference.	0.30
9/12/07	JEH Phone conversation with Jean Shi re call to client.	0.20
	JEH Teleconference with client and Jean Shi re tomorrow's status/settlement conference.	1.20

Qian, Xiao Li

Page 13

		<u>Hours</u>
9/13/07	JEH Prepare for status/settlement conference. Go to District Court for conference. Grace does not appear, conference continued for one week.	1.70
	JEH Review court order.	0.20
	JEH Phone conversation with Islam re status of case.	0.20
	JEH Meeting with Ray Crisostimo outside courthouse re Grace.	0.30
9/19/07	JEH Phone conversation with Jean Shi re status conference.	0.20
9/21/07	JEH Phone conversation with Jean Shi re hearing.	0.20
	JEH Prepare for status/settlement conference. Go to District Court for status/settlement conference. Grace failed to appear.	1.30
	JEH Review court order striking answer.	0.20
9/25/07	JEH Research re default issues. Draft motion for entry of default.	1.00
9/26/07	JEH Phone conversation with Faye at District Court.	0.20
10/8/07	JEH Review entry of default. Meeting with GLH re deposition video.	0.50
	JEH Review videotape of deposition.	0.70
	GLH Arrangement of depo recordings for Horey.	0.50
11/2/07	JEH Draft motion for default judgment. Research rules re same.	0.90
	ABS Efile motion for default judgment/notice.	0.25

Qian, Xiao Li

Page 14

		<u>Hours</u>
11/2/07	JEH Phone conversation with District Court re hearing date.	0.20
	JEH Research grantor-grantee index at Recorder's Office re property of Grace. Meeting with Aura re hearing date.	0.90
11/6/07	ABS Research in Recorder's Office re land transactions of Grace Intl.	2.00
11/7/07	JEH Draft request for re-entry letter.	0.40
	JEH Meeting with Immigration re re-entry.	0.30
	JEH Phone conversation with Islam re client's new passport number.	0.20
	JEH Review memo from Islam, draft reply to same.	0.30
11/8/07	JEH Phone conversation with translator Jean Shi re hearing.	0.20
	JEH Phone conversation with Antonette at Immigration re passport.	0.20
	JEH Phone conversation with Jenny at Immigration re re-entry letter.	0.20
11/9/07	JEH Phone conversation with Evelyn re re-entry letter.	0.20
	JEH Draft authorization to pick up re-entry letter.	0.20
11/13/07	JEH Phone conversation with Jean Shi re sending re-entry letter.	0.20
	JEH Phone conversation with Islam re re-entry letter.	0.40
11/21/07	JEH Phone conversation with Islam re client's arrival from China.	0.20
11/23/07	JEH Phone conversation with client re appointment.	0.20
11/29/07	JEH Phone conversation with Jean Shi to arrange for translation at hearing.	0.20

Qian, Xiao Li

Page 15

		<u>Hours</u>	
11/29/07	JEH Meeting with client re upcoming hearing.	0.50	
12/4/07	JEH Prepare for meeting with client. Meeting with client to prepare for hearing on default judgment.	4.00	
12/5/07	JEH Meeting with client to prepare for hearing.	6.40	
12/6/07	JEH Prepare for hearing. Court appearance for hearing on default judgment.	4.00	
12/7/07	JEH Review order re interest calculation. Meeting with accountant Inna re same.	0.30	
12/11/07	JEH Research re interest rates. Meeting with accountant Inna re same.	0.50	
12/12/07	JEH Review new interest calculations. Meeting with Inna re same.	0.50	
12/13/07	JEH Review amended interest calculations. Draft submission to the court re same.	0.80	
12/14/07	JEH Phone conversation with client re order.	0.20	
	ABS E-file adjusted interest rate and exhibits.	0.50	
12/18/07	JEH Meeting with Inna re bills.	0.30	
	JEH Phone conversation with Jean Shi re bills.	0.20	
	JEH Research re bill of costs.	0.40	
			<u>Amount</u>
	AMOUNT DUE ON HOURS WORKED	149.05	\$35,407.00
	Additional charges:		
	- Filing fee - Complaint and Demand for Jury Trial - boh 7349		350.00

Qian, Xiao Li

Page 16

	<u>Amount</u>
- Xerox Charges	14.20
- Translation Services-Qian Lieberman (4/24-6/13/07)	630.00
- Translation Services-Jean Shi	825.00
Total costs	<hr/> \$1,819.20
TOTAL AMOUNT DUE	<hr/> \$37,226.20
Balance due	<hr/> <hr/> \$37,226.20

Attachment "A"**Saipan Office Rates for Year 2005**

<u>Attorney Fees</u>	<u>Hourly Rate</u>
Robert J. O'Connor	\$300.00
Michael W. Dotts	\$265.00
Gregory J. Koebel ¹	\$260.00
David G. Banes	\$245.00
Joseph E. Horey ²	\$245.00
Eric D. Bozman	\$190.00
George L. Hasselback (paralegal)	\$185.00
Catherine Chang (paralegal)	\$175.00
Auralou Sabangan (paralegal)	\$130.00
Kio Fuji – legal assistance	\$ 65.00
– translation (Japanese/English)	\$ 55.00

<u>Misc. Services</u>	<u>Flat Fee</u>
Incorporation	\$1,300.00
Obtain Business license	\$ 500.00
Act as Resident Agent per year (If business has no resident agent.)	\$ 700.00

<u>Costs</u>	<u>Charges</u>
Xerox	\$0.45/page
Fax Charges within CNMI	\$0.50/page
Fax Charges outside CNMI	\$5.00 for 1 st page, \$2.00 for succeeding pages
Long Distance	1.33 times of actual charges
Mileage	\$0.325/mile
Postage	Actual Charges
Misc. Services re:	\$33.00/hour
Word Processing;	
Law Clerk's Services;	
Messenger Services, etc.	
Misc. Expenses	Actual Charges

FORM-AttorneyRates2005.rtf

¹ \$300.00 per hour tax work.² \$280.00 per hour appellate work.

Q&E Linguistics

1158 Humboldt St. #12
 Santa Rosa, CA 95404 USA
 xixi1774@hotmail.com
 Mrs. Qian Lieberman
 English/Chinese Translator

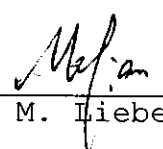
To: Mr. Horey

Date	Time In	Time Out	Hours	Activities
04/24/2007	4:00pm	7:00pm	4	Office Translation(Law office)
04/24/2007	8:00pm	11:00pm	3	Documents Translation(Home)
04/25/2007	8:00pm	12:00pm	4	Documents Translation(Home)
04/30/2007	8:00am	9:30pm	3.5	Office Translation(Law office&Court)
05/07/2007	8:00am	10:15pm	2.3	Office Translation
05/10/2007	1:00pm	1:40pm	2/3	Phone contact with Mr. Huang
05/11/2007	1:30pm	3:30pm	2	Translation(Chamber's Room&Law office)
06/08/2007	9:00am	9:30pm	1/2	Phone conference with Ms.Qian
06/13/2007	9:00am	10:00am	1	Court Translation

Total Hours : 20.8

As per agreement of \$30@hour x 21 hours=\$630

Prepared by:


 Qian M. Lieberman

Date: 11-08-2007

Exhibit "C"

America Crown Corporation

P.O.Box 503754 CK Saipan, MP96950 Tel: 670-235-8845

TO: Mr. Joseph Horey Law Office

Following the bill for Chinese translation service performed by Jean Shi of America Crown Corp. was for Qian, Xiao Li's labor matter at the district court in Saipan.

Below is an itemized list of the work that I performed.

Date	Place	Time	Hour	Amount
7/4/07	Mr. Horey's office	9:00am~12:45pm	4hr	\$120.00
7/5/07	"	10:30am~1:15pm	3hr	\$ 90.00
7/6/07	"	8:00~10:20am	3hr	\$ 90.00
7/30/07	" 4 long distance	1:30~2:30pm	1hr	\$ 30.00
8/8/07	receiving call & making call		1hr	\$ 30.00
8/20/07	Mr. Horey's office	11:05~11:55am	1hr	\$ 30.00
"	"	4:00~4:55pm	1hr	\$ 30.00
9/3,4,5/07	long distance		1hr	\$ 30.00
9/11/07	Mr. Horey's office	3:00~3:35pm	1hr	\$ 30.00
9/12/07	"	12:50~1:25pm	1hr	\$ 30.00
"	"	2:50~4:15pm	1.5hr	\$ 45.00
9/13/07	Dis. Court & Call	10:30~11:30am	1hr	\$ 30.00
9/19/07	1 distance	3 min.		
9/21/07	Dis Court & 1 distance	11:00~11:20am	1hr.	\$ 30.00
11/29/07	Mr. Horey's office	3:00~4:20pm	1.5hr	\$ 45.00
12/4/07	"	3:00~4:30pm	1.5hr	\$ 45.00
12/5/07	"	3:00~4:30pm	1.5hr	\$45.00
12/6/07	Mr. Horey's office &	8:15~10:40am	2.5hr	\$ 75.00

Total hour & amount: 27.5hr. & \$825.00

Date:

12/19/07

Signature:



Exhibit "D"